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*Attorneys for Defendant Gregory Bryan*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MOHAMED MAHMOUD

Plaintiff,

v.

STEVE SISOLAK, *et al.*,

Defendants.

Case No. 2:22-cv-00615-APG-MDC

**JOINT STIPULATION REPORT**

Plaintiff Mohamed Mahmoud, by and through counsel Tiffany Solari, Esq., and Defendant Gregory Bryan, by and through counsel, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Nathan M. Claus, Deputy Attorney General, of the State of Nevada, Office of the Attorney General, hereby submit this Joint Stipulation Report.

Since the filing of the last stipulation, ECF No. 63, Mr. Claus sent an email to Counsel for Mary Lefler, Kari Stephens on Wednesday July 31, 2024. *See Exhibit A.* Ms. Stephens informed Mr. Claus that Ms. Lefler has only been conferred limited authority as Special Administrator to be substituted as a Defendant in the place of Gregory Martin in the matter of *George Brass v. State of Nevada ex rel NDOC, et al.*, USDC Case No. 2:21-cv-00074-RFB-MDC. *Id.* Upon inquiry, Ms. Stephens indicated that neither she nor Ms. Lefler would accept any suggestions of death related to matters not part of the *Brass* case. *Id.*

On August 12, 2024, Mr. Claus forwarded the email exchange with Ms. Stephens to Ms. Solari indicating that he believed that Ms. Solari, on behalf of her client, will likely

have to either retain the services for Ms. Stephens (or some other estate attorney) to seek to get a specific letter of administration for this case similar to the process used in *George Brass v. State of Nevada ex rel NDOC, et al.*, USDC Case No. 2:21-cv-00074-RFB-MDC. In the underlying probate action, P-24-120977-E, *In the Matter of the Estate of Gregory Martin*, Ms. Lefler appears to have been commissioned by Mr. George Brass to complete the request for special administration. See Exhibit B: P-24-120977-E - Ex Parte Petition - EXPP PRB. Mr. Brass is also an inmate in the custody of the Nevada Department of Corrections<sup>1</sup> represented by probono counsel (Joshua A. Dowling, Esq.).<sup>2</sup> Ms. Solari believes that pursuant to *Macias v. Nevada*, No. 3:19-cv-00310-ART-CSD, 2023 WL 4530483 (D. Nev. July 12, 2023), and in light of Mr. Mahmoud's status, the Attorney General's office should undertake further efforts to retain a Special Administrator for Defendant Gregory Martin. It is the Attorney General's position that it has neither any authority under state law, and that its attorneys may run afoul of the Rules of Professional Conduct, should it take steps to retain a Special Administrator on behalf of Mr. Martin, as neither the Office nor any attorney within the office has any client to obtain consent from relating to taking those actions. See NRS 41.0339(1);NRPC 1.6(a), 1.8(b), 1.9(a)-(c), 1.18.

As of this report, the identities of John Doe 3, John Doe 4, John Doe 5, John Doe 6, John Doe 7, John Doe 9, and Jane Doe 1 have yet to be discovered and the parties are exploring possible settlement options.

The parties are asking for an additional 30 day stay.

DATED this 30th of August, 2024.

DATED this 30th of August, 2024.

CLARK HILL PLLC

AARON D. FORD  
Attorney General

/s/ Tiffany Solari  
TIFFANY SOLARI (Bar No. 16003)

/s/ Nathan M. Claus  
NATHAN CLAUS (Bar No. 15889)

*Pro Bono Attorney for Plaintiff,  
Mohamed Abdalla Mahmoud*

*Attorney for Defendant  
Gregory Bryan*

<sup>1</sup> See USDC Case No. 2:21-cv-00074-RFB-MDC at ECF No. 11

<sup>2</sup> *Id.* at ECF No. 64.

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on August 30, 2024, I electronically filed the foregoing **JOINT STIPULATION REPORT** via this Court's electronic filing system. Parties who are registered with this Court's electronic filing system will be served electronically.

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/s/ Kimalee Goldstien  
An employee of the  
Office of the Nevada Attorney General

IT IS SO ORDERED. This case is stayed until September 30, 2024.  
The parties shall file a Stipulation and Report regarding the status of the matter by no later than September 30, 2024.

  
Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge  
Dated: 09-03-24